

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (RCC)
ECF case

This document relates only to: Ashton v. Al Qaeda Islamic Army, 02-CV-6977 (RCC)

This document is filed on behalf of Defendant Sheikh Yusef al Qardawi

**DECLARATION OF AMY ROTHSTEIN IN OPPOSITION TO
MOTION FOR DEFAULT JUDGMENT**

AMY ROTHSTEIN hereby makes the following declaration pursuant to 28 U.S.C. § 1746:

1. I am an attorney admitted to practice in this Court. I am of counsel to the firm of Doar Rieck Kaley & Mack. On March 26, 2006 I was retained by Sheikh Yusuf al Qaradawi to represent him in this multi-district litigation.

2. I am informed by Sheikh Yusuf's London solicitors that for at least fourteen months, contacting approximately ten New York law firms, they attempted to obtain counsel for the Sheikh in this matter.

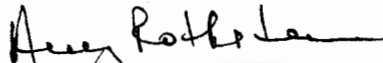
3. My client is an elderly man who resides in Qatar. I have not been able to communicate with him directly and do not yet know whether he even speaks English.

4. I have not been able to acquire the information I require to draft the motion to dismiss I intend to file. I plan to move for dismissal of the complaints against Sheikh Yusuf, including that in *Ashton v. Al Qaeda Islamic Army*, for failure to state a claim on which relief can be granted. Depending on the information I obtain from my client, I also expect to move on the grounds of lack of personal jurisdiction and insufficient service of process.

WHEREFORE, I respectfully request that the motion for a default judgment be denied.

I declare under penalty perjury that the foregoing is true and correct.

Executed on: April 18, 2006


AMY ROTHSTEIN